

# **Exhibit 7 Illinois Proposals**

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**Illinois – Meta Proposal**

**Search Terms:** Meta made its most recent counterproposal on December 4, 2024 to the Illinois (i) Board of Education (ii) Department for Children and Family Services, (iii) Department of Human Services, (iv) Department of Public Health, and (v) Office of the Governor. At a high level, Meta’s proposal includes some standalone search terms proposed by Illinois with some additional search strings proposed by Meta. Meta’s proposal also includes additional search string combinations consisting of the “Additional Terms” proposed by Meta that occur “within 50” of one of the following “Youth Terms”:

("minor\*" OR "youth\*" OR young OR "kid\*" OR "teen\*" OR "adolescent\*" OR "preteen\*" OR "pre-teen\*" OR "tween\*" OR underage\* OR “under-age” OR juvenile\* OR U18 OR “under 18” OR U13 OR “under 13” OR (gen\* w/5 z) OR “gen\* z” OR “gen-z\*” OR “gen z” OR (gen\* w/5 alpha) OR “gen-a\*” OR “gen\* alpha” OR scholar\* OR school\* OR student\* OR pupil\*)

#	Standalone Search Terms
1.	Any emails to/from/cc/bcc: any recipient with domain @meta.com, or @facebook.com, or @fb.com
2.	"children's mental health" AND "social media"
3.	"youth mental health" AND "social media"
4.	"children's behavioral health transformation initiative"
5.	“Illinois Children’s Mental Health Partnership”
6.	“ICAC”
7.	“COPPA”
8.	“social dilemma”
9.	Cyberbull* AND ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR “under-age” OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen* w/5 z) OR “gen* z” OR “gen-z*” OR “gen z” OR (gen* w/5 alpha) OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil*)
10.	Screentime
11.	“screen time”
12.	((“social media” OR Facebook OR Instagram OR “META” OR tiktok OR Snapchat OR Bytedance OR twitter) w/15 (complain* OR investigat*))

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13.	“surgeon general” w/50 “social media”
14.	((“social media” OR Facebook OR Instagram OR “META” OR tiktok OR Snapchat OR Bytedance OR twitter) w/50 (policy OR policies OR procedure* OR guideline*))
15.	("social media" OR “social network” OR OR Insta OR "meta" OR Snapchat OR Bytedance OR TikTok OR OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR “screen time” OR screentime OR “direct message” OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta) AND ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR “under-age” OR juvenile OR U18 OR “under 18” OR U13 OR “under 13” OR (gen* w/5 z) OR “gen* z” OR “gen-z*” OR “gen z” OR (gen* w/5 alpha) OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil* )
16.	(Facebook OR Instagram OR Twitter OR DM) w/ 15 ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR “under-age” OR juvenile* OR U18 OR “under 18” OR U13 OR “under 13” OR (gen* w/5 z) OR “gen* z” OR “gen-z*” OR “gen z” OR (gen* w/5 alpha) OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil*)
17.	“Social media” AND “copyright” AND “mental health”
18.	“Social media” AND “abstract” AND “mental health”
19.	“Social media” AND “abstract” AND “wellbeing”
20.	“negativ*” w/25 “compar*”
21.	“consumer protection” AND ("minor*" OR "youth*" OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR U18 OR “under 18” OR U13 OR “under 13” OR “gen* z” OR “gen-z*” OR “gen z” OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil*)
22.	"adverse childhood experience*" OR ACE*
23.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”) w/ 50 ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR “under-age” OR juvenile* OR U18 OR “under 18” OR U13 OR “under 13” OR (gen* w/5 z) OR “gen* z” OR “gen-z*” OR “gen z” OR (gen* w/5 alpha) OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil*)
24.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))

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	Additional Terms
26.	Youth Terms <b>w/50</b> (wellbeing OR well-being OR self-confidence OR “self confidence” OR “mental health” OR “TMH” OR “anxi*” OR “anti-anxie*” or “DEPRESS*” OR antidepress*” OR reclus* OR stress OR “attention defecit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR lonel*)
27.	Youth Terms <b>w/50</b> (“pro-ana” OR “BMI” OR “overweight” OR fat OR obes* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive)
28.	Youth Terms <b>w/50</b> (bully* OR bullie* OR cyberbull* OR harass* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR solicit* OR pedophil* OR predator* OR sextort OR exploit* OR violen* OR abus* OR assault* OR misbehav* OR rape)
29.	Youth Terms <b>w/50</b> (addic* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime timespent OR “time spent”OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
30.	Youth Terms <b>w/50</b> (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
31.	Youth Terms <b>w/50</b> (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
32.	Youth Terms <b>w/50</b> (negative w/3 (“appearance comparison” OR experience OR affect* OR effect*))
33.	Youth Terms <b>w/50</b> (compar w/5 (appearance OR social OR other* OR negative))
34.	Youth Terms <b>w/50</b> (svap* OR “ecig” OR “e-cig” OR cig* OR drug* OR alcohol* OR Juul)

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**Custodians:** Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by the Illinois AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Board of Education	Kristin Kennedy*	Chief Legal Officer
Board of Education	Jennifer Saba*	Chief Education Officer of Operations
Board of Education	Melissa Oller*	Chief Operating Officer
Board of Education	Rae Clementz*	Executive Director, Data Accountability and Assessment
Department of Children and Family Services	Jassen Strokosch*	Former Chief of Staff
Department of Children and Family Services	Heather Tarczan*	Deputy Director of Communications
Department of Children and Family Services	Julie Barbosa*	Chief Deputy Director, Strategy and Performance Execution
Department of Children and Family Services	Mary Nam*	Former Associate Director, Strategy and Performance Execution
Department of Children and Family Services	Bill McCaffrey*	Former Director of Communications

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Human Services	Dulce Quintero*	Secretary of Human Services; Former Assistant Secretary of Operations
Department of Human Services	Grace Hou*	Secretary of Human Services
Department of Human Services	James Dimas*	Secretary of Human Services
Department of Human Services	Kia Coleman*	Assistant Secretary
Department of Human Services	Kristin Chernawsky*	Assistant Secretary; Former Director of the Division of Early Childhood, Family, and Community; Former Assistant Secretary of Programs
Department of Human Services	Priya Khatkhate*	System transformation Administrator; Former Senior Policy Advisor
Department of Human Services	David Albert*	Director, Division of Mental Health; Former Deputy Director of Clinical Operations
Department of Human Services	Diane Knaebe*	Director, Division of Mental Health
Department of Human Services	Lisa Betz*	Deputy Director, Child and Adolescent Services
Department of Human Services	Ryan Rollinson*	Chief of Staff
Department of Public Health	Dana Weiner	Chief Officer
Department of Public Health	Sameer Vohra*	Director of the Department
Department of Public Health	Shannon Lightner*	COO; Former Deputy Director of the Office of Women's and Family Services

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Public Health	Lisa Masinter*	Deputy Director of the Office of Women's and Family Services
Department of Public Health	Julie Davis*	N/A
Department of Public Health	Melissa Stalets*	Deputy Director of the Office of Health Promotion
Department of Public Health	Sarah Patrick, M.D. *	Epidemiologist, Office of Health Promotion
Office of the Governor	Andy Manar*	Deputy Governor, Budget and Economy
Office of the Governor	Dan Hynes*	Deputy Governor, Budget and Economy
Office of the Governor	Claire Lindberg*	1 <sup>st</sup> Assistant Deputy Governor, Budget and Economy
Office of the Governor	Lisa Duarte*	1 <sup>st</sup> Assistant Deputy Governor, Budget and Economy
Office of the Governor	Christy George*	1 <sup>st</sup> Assistant Deputy Governor, Budget and Economy
Office of the Governor	Grace Hou*	Deputy Governor, Human Services
Office of the Governor	Sol Flores*	Deputy Governor, Human Services
Office of the Governor	Lizzy Whitehorn*	1 <sup>st</sup> Assistant Deputy Governor, Human Services
Office of the Governor	Ryan Croke*	1 <sup>st</sup> Assistant Deputy Governor, Human Services
Office of the Governor	Martin Torres*	Deputy Governor, Education
Office of the Governor	Jesse Ruiz*	Deputy Governor, Education

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of the Governor	Teresa Ramos*	1 <sup>st</sup> Assistant Deputy Governor, Education
Office of the Governor	Christian Mitchell*	Deputy Governor, Public Safety and Infrastructure
Office of the Governor	Bria Scudder*	Deputy Governor, Public Safety and Infrastructure
Office of the Governor	Camile Lindsay*	1 <sup>st</sup> Assistant Deputy Governor, Public Safety and Infrastructure
Office of the Governor	Shareese Pryor*	1 <sup>st</sup> Assistant Deputy Governor, Public Safety and Infrastructure
Office of the Governor	Emily Miller*	Legislative and Policy
Office of the Governor	Chris Shallow*	Legislative and Policy
Office of the Governor	Lee LoBue*	Legislative and Policy
Office of the Governor	Leslie Munger*	Former Deputy Governor
Office of the Governor	Richard Goldberg*	Former Deputy Chief of Staff
Office of the Governor	Rodger Heaton*	Former Deputy Chief of Staff
Office of the Governor	Michael Lucci*	Former Deputy Chief of Staff
Office of the Governor	Darlene Senger	Former Deputy Chief of Staff
Office of the Governor	Jennifer Hammer	Former Special Counsel to the Governor and Policy Adviser for Healthcare and Human Services



## **FINAL ILLINOIS AG SEARCH TERM PROPOSAL**

**Illinois Office of the Governor (“Gov Office”)**

**Illinois Department of Human Services (“DHS”)**

**Illinois State Board of Education (“ISBE”)**

**Date Range:** January 1, 2015, to October 23, 2023

### **Governor’s Office Custodians:**

#### *Pritzker Administration:*

##### Budget and Economy

Andy Manar – Deputy Governor

Dan Hynes – Deputy Governor

Claire Lindberg – 1st Assistant Deputy Governor

Lisa Duarte – 1st Assistant Deputy Governor

Christy George – 1st Assistant Deputy Governor

##### Human Services

Grace Hou – Deputy Governor

Sol Flores – Deputy Governor

Lizzy Whitehorn – 1st Assistant Deputy Governor

Ryan Croke – 1st Assistant Deputy Governor

##### Education

Martin Torres – Deputy Governor

Jesse Ruiz – Deputy Governor

Teresa Ramos – 1st Assistant Deputy Governor

##### Public Safety & Infrastructure

Christian Mitchell – Deputy Governor

Bria Scudder – Deputy Governor

Camile Lindsay – 1st Assistant Deputy Governor

Shareese Pryor – 1st Assistant Deputy Governor

##### Legislative and Policy

Emily Miller

Chris Shallow

##### Constituent Affairs

Lee LoBue

#### *Rauner Administration:*

Richard Goldberg, Deputy Chief of Staff

Jennifer Hammer, Special Counsel to the Governor and Policy Adviser for

Healthcare and Human Services

Rodger Heaton, Deputy Chief of Staff

Darlene Senger, Deputy Chief of Staff

Leslie Munger, Deputy Governor

Michael Lucci, Deputy Chief of Staff

**Department of Human Services (“DHS”) Custodians:**

Dulce Quintero, Secretary of Human Services

- 5/6/2019-10/7/2023 – Assistant Secretary of Operations (DHS)
- 10/8/2023-Present – Secretary (DHS)

Grace Hou, Secretary of Human Services

- 3/18/2019-10/8/2023 – Secretary (DHS)

James Dimas, Secretary of Human Services (DHS)

- 5/18/2015-3/17/2019

Kia Coleman, Assistant Secretary of Programs (DHS)

- 5/6/2019-5/31/2021

Kirstin Chernawsky, Assistant Secretary (DHS)

- 10/18/2021-3/31/2023 – Director of the Division of Early Childhood
- 4/1/2023-4/30/2024 – Associate Secretary - Early Childhood, Family, and Community
- 5/1/2024-9/13/2024 – Assistant Secretary of Programs

Priya Khatkhate

- 8/22/2022-10/15/2023 - Senior Policy Advisor
- 10/16/2023-Present - System Transformation Administrator

David Albert, Director, Division of Mental Health

- 6/17/2019-12/31/2019 - Deputy Director Clinical Operations
- 1/1/2020-Present – Director of the Division of Mental Health

Diana Knaebe, Director, Division of Mental Health

- 9/9/2015-6/16/2019

Lisa Betz, Deputy Director, Child and Adolescent Services

- 11/7/2011-Present

**Illinois State Board of Education (“ISBE”) Custodians:**

Kristin Kennedy, Chief Legal Officer

Jennifer Saba, Chief Education Officer of Operations

Melissa Oller, Chief Operating Officer

Rae Clementz, Executive Director of Data, Accountability & Assessment

**Illinois Affirmatively Proposed Search Terms**

1. Any emails to/from/cc/bcc: any recipient with domain @meta.com, or @facebook.com, or @fb.com
2. "children's mental health" AND "social media"
3. "youth mental health" AND "social media"
4. "children's behavioral health transformation initiative"
5. “Illinois Children’s Mental Health Partnership”
6. “ICAC”
7. “COPPA”
8. “social dilemma”

9. Cyberbull\* AND ("minor\*" OR "youth\*" OR "kid\*" OR "teen\*" OR "adolescent\*" OR "preteen\*" OR "pre-teen\*" OR "tween\*" OR U18 OR “under 18” OR U13 OR “under 13” OR “gen\* z” OR “gen-z\*” OR “gen z” OR “gen-a\*” OR “gen\* alpha” OR scholar\* OR school\* OR student\* OR pupil\* )
10. Screentime
11. “screen time”
12. ((“social media” OR Facebook OR Instagram OR “META” OR tiktok OR Snapchat OR Bytedance OR twitter) w/15 (complain\* OR investigat\*))
13. “surgeon general” w/50 “social media”
14. ((“social media” OR Facebook OR Instagram OR “META” OR tiktok OR Snapchat OR Bytedance OR twitter) w/50 (policy OR policies OR procedure\* OR guideline\*))
15. “Social media” AND “copyright” AND “mental health”
16. “Social media” AND “abstract” AND “mental health”
17. “Social media” AND “abstract” AND “wellbeing”
18. “negativ\*” w/10 “compar\*”
19. “consumer protection” AND ("minor\*" OR "youth\*" OR "kid\*" OR "teen\*" OR "adolescent\*" OR "preteen\*" OR "pre-teen\*" OR "tween\*" OR U18 OR “under 18” OR U13 OR “under 13” OR “gen\* z” OR “gen-z\*” OR “gen z” OR “gen-a\*” OR “gen\* alpha” OR scholar\* OR school\* OR student\* OR pupil\*)
20. "adverse childhood experience\*" OR ACE\* [ONLY FOR GOV OFFICE]

**Additional Terms From Meta Proposals [ONLY FOR GOV OFFICE]**

*Youth Terms:*

("minor\*" OR "youth\*" OR "kid\*" OR "teen\*" OR "adolescent\*" OR "preteen\*" OR "pre-teen\*" OR "tween\*" OR U18 OR “under 18” OR U13 OR “under 13” OR “gen\* z” OR “gen-z\*” OR “gen z” OR “gen-a\*” OR “gen\* alpha” OR scholar\* OR school\* OR student\* OR pupil\* OR)

*W/20 Harm Terms:*

21. “mental health” OR “TMH” OR “ACE\*” OR “adverse childhood experience” OR “anxi\*” OR “anti-anxie\*” or “DEPRESS\*” OR antidepress\*” “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR lonel\*
22. anorexi\* OR bulimi\* OR orthorexi\* OR OR dysmorph\* OR suicid\* OR “self harm” OR “self-harm” OR selfharm OR unalive
23. bully\* OR bullie\* OR cyberbull\* OR sextort OR exploit\*
24. addic\* OR dopamine OR rabbithol\* OR “social reward” OR “social approval” OR “screen time” OR screentime timespent OR “time spent”
25. (eat\* w/3 (problem\* OR issue\* OR trouble\* OR difficult\* OR disorder\* OR disab\* OR agitat\* OR behav\* OR insufficient OR depriv\*))

- 26. (sleep\* w/3 (problem\* OR issue\* OR trouble\* OR difficult\* OR disorder\* OR disab\*  
OR agitat\* OR behav\* OR insufficient OR depriv\*))
- 27. (negative w/3 (“appearance comparison” OR affect\* OR effect\*))
- 28. (compar w/5 (appearance OR social OR negative))

## **FINAL ILLINOIS AG SEARCH TERM PROPOSAL**

### **Illinois Department of Public Health ("IDPH")**

[Already responded to Rule 45 subpoena; limited contingent proposal]

#### **Custodians:**

Sameer Vohra, Director of the Department, August 2022 to present

Shannon Lightner, IDPH COO and Former Deputy Director of OWHFS, November 2015 to September 2024

Lisa Masinter, Deputy Director of Office of Women's and Family Services (OWHFS), September 2022 to present

Julie Davis, 2018 to present

Melissa Stalets, Deputy Director of Office of Health Promotion, January 2021 to present

Sarah Patrick, MD, Epidemiologist, Office of Health Promotion, December 2020 to present

#### **Date Range:**

January 1, 2015 to October 23, 2023

#### **Terms:**

1. "children's mental health" AND "social media"
2. "youth mental health" AND "social media"
3. "children's behavioral health transformation initiative"
4. "Illinois Children's Mental Health Partnership"
5. "ICAC"
6. "COPPA"
7. (("social media" OR Facebook OR Instagram OR "META" OR tiktok OR Snapchat OR Bytedance OR twitter) w/20 (policy OR policies OR procedure\* OR guideline\*))
8. "Social media" AND "peer review\*" AND "mental health"
9. "Social media" AND "peer review\*" AND "wellbeing"
10. "Social media" AND "abstract" AND "mental health"
11. "Social media" AND "abstract" AND "wellbeing"

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta Payments, Inc.

**DECLARATION OF MARK MADONIA  
IN SUPPORT OF ILLINOIS' LETTER  
BRIEF**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook Holdings, LLC, Facebook Operations, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION THIS  
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

1 I, Mark Madonia hereby declare and state as follows:

- 2 1. I am the ESI Manager for the Illinois Department of Innovation and Technology  
3 (“DoIT”).
- 4 2. I have been in this position for almost two years, prior to being an ESI Manager I was the  
5 primary ESI technician for 14 and ½ years.
- 6 3. Through the course of my duties in the positions stated above I have run thousands of ESI  
7 search requests.
- 8 4. I have personal knowledge of the facts stated herein and could competently testify to  
9 them.
- 10 5. The Department of Innovation and Technology was created in 2017 by Executive Order  
11 2016-001.
- 12 6. Pursuant to 20 ILCS 1370, DoIT handles the IT function of client agencies as defined  
13 under the statute. For the purposes of this declaration, client agencies include, DCFS,  
14 DPH, and DHS
- 15 7. DoIT users Veritas Discovery Accelerator and Microsoft Purview (Standard) for  
16 eDiscovery purposes. DoIT utilization capabilities, and limitations can be found on  
17 Exhibit One, attached hereto.
- 18 8. We can provide hit-counts on search terms which can be de-duplicated when data is  
19 exported.
- 20 9. When providing hit-counts for individual custodians it must be done through a manual  
21 process one custodian at a time when searching for data prior to October 2021. Therefore,  
22 these types of individual custodian reports require significant staffing recourses and take a  
23 significant amount of time.
- 24 10. A lot of these requests require manual imputation, and I am currently the only ESI  
25 Manager who can construct and provide complex ESI requests and subsequent production  
26 for the case at hand. For example, I must manually construct each search string. For  
27  
28

1 purposes of generating useable “hit reports,” this includes breaking apart any search string  
2 using the OR/AND connector into its constituent parts.

3 11. On November 22nd Microsoft suffered a nation-wide issue with its Office 360 tools. This  
4 outage impacted my agency for multiple days which meant I could not generate accurate  
5 reports using the Microsoft Purview tool during for two days. The nation-wide issue was  
6 resolved over the weekend and hit reports (DHS and DCFS) were provided on November  
7 26th.

8 12. With respect to DCFS, there is an additional issue, we did not begin journaling accounts  
9 until mid-2017, and were only able to journal accounts that were migrated over to our  
10 systems.

11 13. If a potential custodian left DCFS prior to mid-2017, it is unknown where or if that  
12 custodian’s records exist. If we were able to locate them, the archival system (Zantaz) is  
13 no longer supported, and we could not guarantee completeness or accuracy of any search.  
14

15 I declare under penalty of perjury under the laws of the United States of America that the  
16 that the foregoing statement, to the best of my knowledge, is true and correct.  
17

18 Executed on December 9, 2024, in Springfield Illinois.

19  
20 Mark  
Madonia

Digitally signed by Mark  
Madonia  
Date: 2024.12.09  
13:00:45 -06'00'

21 Mark Madonia  
22  
23  
24  
25  
26  
27  
28



**EXHIBIT 1****Veritas Enterprise Vault - Discovery Accelerator**

Enterprise Vault was enabled 1/1/2009. A copy of every message sent/received are sent to corresponding agency journal. We then use Veritas Discovery Accelerator to search for and export the native .msg or .eml format - copied into an Outlook .pst file. This is the primary tool used for searching agency journal, older legacy email and when there are more than 20 terms due to limitations in MS Purview. User archives (Enterprise Vault) are a legacy archive system that was used prior to implementation of MS O365 (which occurred 2016-2017 depending on the agency.)

Journal Retention (7-1-2015 – present. Ten-year retention). DoIT can guarantee data back to this date. Older data can be discovered if it has been placed on hold from prior case.

User Vault Retention (user-controlled retention). We can pull whatever the user let be archived and retained in their personal vault. Deleted data can be discovered if it has been placed on hold from prior discovery case and prior to user deletion.

Text Retention (6/1/2023-present. Keep forever retention). A daily digest email is created with the text conversation and sent to the user's mailbox and agency journal. This data can be pulled from both Discovery Accelerator and MS Purview.

- No search term limit has every been identified. I've searched up to 1,000 terms. However, the more terms, the longer the searches take.
- Boolean searches can be used.
- A "NEAR" proximity operator is now available when running searches. This is set to find words within 50/words of another word. Searches take longer when using the "NEAR" operator.
- De-duplication - True deduplication can only be determined after export. This is especially true when searching multiple user vaults. De-duplication is not conversation threading.
- Term hit count is a manual process where each term needs to be queried for a count after the initial search is run. This process can be very time consuming based on the number of search terms that are used and the volume of data that is returned.

**Microsoft Purview (Mailboxes, OneDrive, Teams, SharePoint)**

Microsoft Purview is used when performing a Mailbox, OneDrive, Teams or SharePoint search. This tool is primarily used for data after 10/1/2021 due to the retention policy. DoIT does not have licensing for Premium eDiscovery so only Standard eDiscovery searches are used. Email results are provided in native .msg format and copied into a .pst file. Teams chat searches are exported as .msg file copied into a .pst file. Conversation Threading is not used for Email or MS Teams chat exports because DoIT does not perform reviews. All other files are exported in native format.

Mailbox Retention (keep forever starting 10-1-2021). We can search mailboxes for data older than this but can't guarantee the results. If a user had deleted the message prior to this retention being set, it won't be found in a mailbox search. Veritas Discovery Accelerator Journal searches are run for data older than this.

Text Retention (6/1/2023-present. Keep forever retention). A daily digest email is created with the text conversation and sent to the user's mailbox and agency journal. This data can be pulled from both Discovery Accelerator and MS Purview.

MS Teams Chat Retention (retain Chat for 7 years then delete it if older) Conversation threading is not used and a copy each chat correspondence creates a separate .msg file. This can make review a very cumbersome process.

MS Teams Files Retention (retain Chat and Channel messages for 7 years then delete it if older)

One Drive/SharePoint Retention (policy set for retaining user OneDrive for 2 years after a user is deleted)

- Limited to 20 search terms per search query/line. Multiple terms can be used on the same line using AND/OR operators. This would allow for a larger list of terms.
- Boolean searches can be used.
- Proximity searches can be used.
- DoIT is licensed only for Standard eDiscovery.
- De-duplication numbers determined after export.
- Term hit can be determined after a search is run using the statistics tab within the search.

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**DoIT produces native format all items (.msg, .eml, .pst format for email, native format for applications)**

**DoIT does not perform any review of discovered items. We provide those results to requesting agency for review, redaction, and final production.**

**Privileged review is done at the agency level.**

**Log File/Metadata contains, subject, sender, recipient, and date. We can produce log files in both Veritas Discovery Accelerator and Microsoft Purview. The logs contain slightly different information, but both contain subject, sender, recipient, and date. Samples of these logs can be provided.**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta Payments, Inc.

**DECLARATION OF DAVID WILLIAMS  
IN SUPPORT OF ILLINOIS' LETTER  
BRIEF**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook Holdings, LLC, Facebook Operations, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION THIS  
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

1 I, David Williams hereby declare and state as follows:

- 2 1. I am the Director of Technology Support and Infrastructure at the Illinois State Board of  
3 Education (“ISBE”).
- 4 2. I have been in this department for over 18 years, with over a decade in a leadership role. I  
5 will have been Director for 3 years this coming June.
- 6 3. I have personal knowledge of the facts stated herein and could competently testify to  
7 them.
- 8 4. The only practical means my department has to search through custodial inboxes is using  
9 the Microsoft Purview platform.
- 10 5. My agency does not permit outside vendors or eDiscovery professional direct access to  
11 our networks and servers for security and data privacy reasons.
- 12 6. Microsoft Purview has some relevant limitations, most importantly, we are unable to  
13 “deduplicate” for the purposes of hit reports.
- 14 7. In addition, providing hits per keyword per custodian is time consuming, requiring that the  
15 search terms be run through custodial inboxes one at a time.
- 16 8. Adding additional custodians and increasing the date range increases the time to complete  
17 searches.
- 18 9. As a result, when terms that are used regularly in many different contexts are run through  
19 the system, it ties up both resources and manpower that would otherwise be dealing with  
20 the day-to-day IT issues of the agency and serves only to generate large numbers rather  
21 than find things that might be useful.
- 22 10. During the week of November 25<sup>th</sup>, Microsoft suffered a nationwide issue with its Office  
23 365 tools. This outage impacted my agency for multiple days and meant I could not  
24 generate accurate reports using the Microsoft Purview tool during this period.
- 25  
26  
27  
28

1  
2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct.

4 Executed on December \_09 \_\_, 2024, in \_\_Springfield, IL\_\_

5  
6 David R Williams

Digitally signed by David R

Williams

Date: 2024.12.09 11:26:23 -06'00'

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DAVID WILLIAMS